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Attorneys for Defendants/Counterclaim  
Plaintiffs Samsung Electronics Co., Ltd. and  
Samsung Electronics America, Inc.

**UNITED STATES DISTRICT COURT**

**SOUTHERN DISTRICT OF CALIFORNIA**

LARGAN PRECISION CO., LTD.,  
Plaintiff and Counterclaim Defendant,  
v.  
SAMSUNG ELECTRONICS CO., LTD.,  
*ET AL.*,  
Defendants and Counterclaim Plaintiffs.

CASE NO. 13-CV-2740-CAB-NLS

**SAMSUNG'S DISCLOSURES  
PURSUANT TO FEDERAL  
RULE OF CIVIL PROCEDURE  
26(A)(3)**

**JURY TRIAL DEMANDED**

Pursuant to the Court's Order granting the Parties' Joint Motion to Reschedule Trial (Dkt. No. 222), Defendants and Counterclaim Plaintiffs Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. ("SEA")<sup>1</sup> (collectively "Samsung") make the following pre-trial disclosures in compliance with Fed. R. Civ. P. 26(a)(3). Samsung reserves the right to modify these disclosures based on Largan's disclosures, the parties' meet-and-confer(s), or any orders regarding the scope of the trial.

**I. WITNESSES SAMSUNG EXPECTS TO PRESENT AT TRIAL**

Pursuant to Fed. R. Civ. P. 26(a)(3)(A)(i), the table below identifies witnesses Samsung expects to present at trial based on the contentions as presently disclosed. Samsung reserves the right to amend its witness list and designation of may or will call, including in response to the contentions and evidence Largan identifies in its pre-trial disclosures and to the extent the parties cannot reach agreement on admissibility of certain evidence. Witnesses identified with an "\*" may be called live or by deposition. Samsung reserves the right to call any witness on Largan's witness list. By identifying witnesses below, Samsung does not waive any objection to any witness that Largan may identify. Samsung does not concede the relevance of any or all issues by its identification of witnesses below.

| Name             | Address   |
|------------------|---|
| Sung Hyun Ahn    | Mr. Ahn may be contacted through Samsung's counsel of record. |
| David Aikens     | c/- Savvy Optics, 35 Gilbert Hill Rd., Chester, CT 06412      |
| J. David Cabello | Blank Rome LLP, 717 Texas Ave, Suite 1400, Houston TX, 77002  |

<sup>1</sup> Effective Jan. 1, 2015, Samsung Telecommunications America, LLC, following a merger into SEA, ceased to exist as a separate corporate entity. Dkt. 70.

| Name                | Address  |
|---------------------|--|
| Chun Shan Chen*     | Mr. Chen may be contacted through Largan's counsel of record.                  |
| Nicholas DiCarlo    | Mr. DiCarlo may be contacted through Samsung's counsel of record.              |
| Hsin Hsuan Huang*   | Ms. Huang may be contacted through Largan's counsel of record.                 |
| Yeo Chih Huang*     | Mr. Huang may be contacted through Largan's counsel of record.                 |
| Daejin Jeon         | Mr. Jeon may be contacted through Samsung's counsel of record.                 |
| ByungKwon Kang      | Mr. Kang may be contacted through Samsung's counsel of record.                 |
| En-Ping (Adam) Lin* | Mr. Lin may be contacted through Largan's counsel of record.                   |
| Chia Wen Lee*       | Ms. Lee may be contacted through Largan's counsel of record.                   |
| Dr. Gregory Leonard | c/- Edgeworth Economics, 333 Bush Street, Suite 1450, San Francisco, CA, 94104 |
| Dr. James McGuire   | c/- McGuire Optical Design, LLC, 1720 Kaweah Drive, Pasadena, CA 91105         |
| Dr. Jose Sasian     | c/- College of Optical Sciences, University of Arizona, Tucson, AZ 85721       |
| Hsiang Chi Tang*    | Mr. Tang may be contacted through Largan's counsel of record.                  |
| Mike Tocci          | c/- Contrast Optical, 6100 Uptown Blvd. NE, Suite 560, Albuquerque, NM 87110   |

| <b>Name</b>     | <b>Address</b>  |
|-----------------|---|
| Tsung Han Tsai* | Mr. Tsai may be contacted through Largan's counsel of record. |
| William Wang*   | Mr. Wang may be contacted through Largan's counsel of record. |

## **II. WITNESSES SAMSUNG MAY CALL IF THE NEED ARISES**

Pursuant to Fed. R. Civ. P. 26(a)(3)(A)(i), the table below identifies witnesses Samsung may call at trial if the need arises. Samsung reserves the right to amend this list including its designations of may call and will call. Samsung reserves the right to call any witness on Largan's witness list. By identifying witnesses below, Samsung does not waive any objection to any witness that Largan may identify. Samsung does not concede the relevance of any or all issues by its identification of witnesses below.

| <b>Name</b>                               | <b>Address (If Not Previously Provided)</b>   |
|---|---|
| Dr. Julie Bentley                         | 5 Center Court Lane, Penfield, New York 14526   |
| Minseok Choi<br>(Partron Co., Ltd.)       | c/- Partron Co., Ltd., 22-6, Seokwoo-dong, Hwaseong-si,<br>Gyeonggi-do, 445-170 Korea                     |
| Soon Cheol Choi<br>(Sekonix Co.,<br>Ltd.) | c/- Sekonix Co., Ltd., 28, Pyeonghwa-ro 2862 beon-gil,<br>Dongducheon-si, Gyeonggi-do, 11307, South Korea |
| Sean Diaz                                 | Mr. Diaz may be contacted through Samsung's counsel of record.  |
| Dr. David Reibstein                       | c/- 743 Jon M. Huntsman Hall, 3730 Walnut Street,<br>University of Pennsylvania, Philadelphia, PA 19104   |

| Name                                | Address (If Not Previously Provided)   |
|-------------------------------------|--|
| Cort Stinnett<br>(ZEMAX, LLC)       | c/- Zemax LLC 10230 NE Points Dr. Suite 540 Kirkland,<br>WA 98033 USA        |
| Rhonda Suematsu<br>(Synopsis, Inc.) | c/- Synopsis, Inc. 690 E. Middlefield Rd. Mountain View,<br>California 94043 |

### III. WITNESSES WHOSE TESTIMONY SAMSUNG EXPECTS TO PRESENT BY DEPOSITION

Pursuant to Fed. R. Civ. P. 26(a)(3)(A)(ii), the table below identifies witnesses whose testimony Samsung expects to present by deposition. Samsung intends to present witnesses identified with an “\*” by deposition if Largan does not call that witness live. The deposition of each witness listed below was taken stenographically. Samsung will disclose the specific portions of each witness’s transcript pursuant to the parties’ agreed schedule. By identifying witnesses below, Samsung does not waive any objection to any witness that Largan may identify. Samsung does not concede the relevance of any or all issues by its identification of witnesses below.

| Name               | Deposition Date |
|--------------------|-----------------|
|                    | 08-25-2015      |
| Dr. Julie Bentley* | 06-02-2016      |
|                    | 10-23-2014      |
| Chun Shan Chen*    | 03-05-2015      |
| Wei Yu Chen        | 05-13-2015      |
|                    | 10-20-2014      |
| Hsin Hsuan Huang*  | 03-07-2015      |
| Yeo Chih Huang*    | 03-06-2015      |

| Name               | Deposition Date |
|--------------------|-----------------|
| En-Ping (Adam) Lin | 04-21-2015      |
| Chia-Wen Lee       | 04-22-2015      |
| Gregory Schmidt    | 05-08-2015      |
|                    | 10-20-2014      |
| Hsiang-Chi Tang*   | 03-03-2015      |
|                    | 03-04-2015      |
| Tsung Han Tsai     | 04-20-2015      |
| William Wang       | 04-23-2015      |
| Ting kang Xia      | 10-08-2014      |

#### **IV. DOCUMENTS OR EXHIBITS SAMSUNG EXPECTS TO OFFER OR MAY OFFER IF THE NEED ARISES**

Pursuant to Fed. R. Civ. P. 26(a)(3)(A)(iii), Appendix 1 identifies a list of exhibits that it expects to offer at trial other than those to be used for impeachment. Samsung further reserves the right to offer any exhibit included on Largan's exhibit list. By including a document on its exhibit list, Samsung does not admit the relevancy of any issues, waive any objections to any document identified by Largan, concede that Largan can use the exhibit, or admit that the exhibit is authentic and/or admissible. Samsung reserves the right to amend or modify its list, consistent with the applicable rules and orders, including in response to Plaintiff's Exhibit List or in response to subsequent orders by the Court. Samsung further reserves the right to offer any exhibit included on Largan's exhibit list.

1  
2 DATED: July 22, 2016

Respectfully submitted,

3 /s/ David W. Higer

4 KIRKLAND & ELLIS LLP

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11 Attorneys for Defendants/Counterclaim  
12 Plaintiffs Samsung Electronics Co., Ltd.  
13 and Samsung Electronics America, Inc.  
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*s/David W. Higer*  
David W. Higer